



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF WATER RESOURCES

William R. Snodgrass - Tennessee Tower
312 Rosa L. Parks Avenue, 11th Floor
Nashville, Tennessee 37243-1102

September 30, 2016

Mr. Joe Brock
Environmental & Regulatory Compliance Coordinator
Clinton Utilities Board
P.O. Box 296
Clinton, TN 37716

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
RECEIPT # 7196 9008 9111 3808 4742

Re: Pretreatment Audit Inspection
Clinton Pretreatment Program
NPDES Permit No. TN0026506
Anderson County

Dear Mr. Brock:

The Division of Water Resources (Division) appreciates your time on June 30, 2016, when Mr. Greg Mize and I met with you to conduct a Pretreatment Audit Inspection of Clinton's industrial pretreatment program. The comments below are based on the results of the inspection.

1. In a letter dated February 1, 2012, Clinton Utilities Board (CUB) received preliminary approval for proposed changes to the Sewer User Ordinance (SUO) and Enforcement Response Plan (ERP) to incorporate the required streamlining changes. However, public notice of these changes has not been completed. In addition, you indicated that CUB may make further changes to the SUO and ERP. As was discussed during the inspection, CUB will need to submit any additional changes to the proposed SUO and ERP to this office for review and approval prior to adopting the documents. If CUB intends to make additional changes to the SUO and ERP, these documents should be submitted to this office for review by January 4, 2017. If CUB does not intend to make additional changes to the SUO and ERP, the public notice process should begin immediately. Proof of public notice should be submitted to this office as soon as the process is completed, but no later than by January 4, 2017.
2. Contributing jurisdictions were discussed during the inspection. Anderson County Water Authority (ACWA) currently discharges wastewater to the CUB WWTP. An Agreement for Wastewater Services was developed between CUB and ACWA which includes pretreatment language. This agreement requires ACWA to adopt a local SUO which is no less stringent and is as broad in scope as the SUO of CUB. Additionally, the agreement requires that whenever CUB revises its SUO, it will forward a copy of the revisions to ACWA, and ACWA will adopt revisions to its SUO that are at least as stringent as those adopted by CUB. This agreement should be thoroughly reviewed to ensure that all requirements of the agreement are being carried out. Additionally, CUB should ensure that in the future, ACWA's SUO is updated in conjunction with CUB adopting the streamlining changes.

3. CUB received final approval for proposed changes to local limits in a letter dated June 12, 2014. Part of CUB's submittal of the local limits included a table titled, "Table 1: CUB Current and Proposed Local Limits." This table contains monthly average and daily maximum limits for BOD, TSS, TKN, and Oil & Grease. However, during the audit, you indicated that these values are intended to be surcharge thresholds, and that exceedances would not damage the plant. If CUB does not intend to enforce these parameters as limits, it should be made clear that these values are surcharge thresholds. Therefore, CUB should submit local limits calculations that clearly show that BOD, TSS, TKN, and Oil & Grease are surcharge parameters. Additionally, this office strongly recommends that CUB have a maximum discharge limit for these parameters in addition to the surcharge levels.
4. It is my understanding that AISIN collects the samples for CUB's compliance monitoring. However, Tennessee Rule 0400-40-14-.08(6)(b). requires CUB to conduct compliance monitoring independent of information supplied by the industry in order to determine compliance. Therefore, CUB will need to immediately start collecting all compliance monitoring samples. Additionally, CUB should maintain sample integrity throughout the sampling process to ensure that contamination or tampering of the sample does not occur.
5. During the inspection, handling of requests by the public to review files was discussed. You indicated that you have never received a request by the public to review files. A plan for public requests to view files needs to be developed in case the need arises. We recommend checking with CUB to see if procedures for handling public requests to review files are available.
6. Oversight inspections were conducted at Powder Cote II, LLC – Plant #1 and Plant #2 (Powder Cote II) and AISIN Automotive Casting Tennessee, Inc. (AISIN) as part of the audit.
 - a. During the inspection at Powder Cote II, the process and domestic auto-samplers were inspected. The tubing appeared to be worn and dirty. CUB should take appropriate actions to ensure that the industry properly maintains its monitoring equipment and that sampling results are representative of the industry's wastestreams.
 - b. The ISCO sampler for the process wastestream at Powder Cote II is located outside of the facility and is connected to a bubble flow meter. The bubble flow meter has a built-in printer which indicates the minimum and maximum pH values at incremental times. During the onsite inspection, you observed a pH minimum reading on the printout that was below the minimum pH permit limit of 6 SU. Additionally, Mr. Greg Roberts, the industry representative during the inspection, stated that an operator at Plant 2 checks the pH every couple of hours from the ISCO sampler. It was unclear during the inspection whether this pH monitoring was conducted in accordance with an approved method contained in 40 CFR Part 136. Per Tennessee Rule 0400-40-14-.12(7)(f), the industry is required to report the results of any additional monitoring conducted at the appropriate sampling location using an approved method contained in 40 CFR Part 136. If the industry is monitoring any parameter more frequently at the appropriate sample location using appropriate procedures, CUB should ensure that all results are reported. Furthermore, if additional monitoring reveals any violations, CUB should follow its approved ERP to take enforcement action as necessary.
 - c. CUB's usual industry contact at Powder Cote II, Mr. Chris Hunsucker, was not available at the time of the audit. During the oversight inspection, we discussed with Mr. Roberts what would take place if the industry were to have a slug load or spill while Mr. Hunsucker is out of town or unavailable. Powder Cote II's industrial user permit requires the industry to post a notice that can be viewed easily by all employees advising them of who to call in the event of an accidental or slug load discharge. During the audit, you requested Mr. Roberts show us this notice, but he was

unsure where it was posted. CUB should follow up with the industry to ensure that this notice is properly placed, and that all employees are aware of the procedures to follow in the case of any accidental discharge, slug loads, or spills.

- d. During the oversight inspection at AISIN, the QA/QC laboratory and the wastewater laboratory were viewed. The sink in the QA/QC laboratory had a sign above it regarding the washing of samples (AISIN's finished product) before quality testing. Mr. Eric Sproles, the industry representative, was unsure where this sink discharged. Additionally, Mr. Sproles stated that the sink to the wastewater laboratory goes directly to the sewer. CUB should determine where the QA/QC laboratory sink is discharged. In addition, CUB should also take appropriate steps to ensure that the discharge from the laboratory sinks is included in all self-monitoring and compliance monitoring sampling of the industry.
 - e. During the oversight inspection at AISIN, you and Mr. Sproles informed me that composite samples for both compliance monitoring and self-monitoring are collected in a bucket that is surrounded by ice in a larger container. The sample is then poured from the bucket into the laboratory container to be sent for analysis. Upon inspection, the bucket did not appear to be properly cleaned for sampling. Additionally, no temperature probe was in place to ensure proper sample preservation. CUB should take appropriate actions to ensure that all sampling is conducted in accordance with a method approved in 40 CFR Part 136, including using the correct sample containers and maintaining the samples at the correct temperature.
7. During the audit, the industrial user files and permits for Powder Cote II and AISIN were reviewed. Both permits expired the day of the audit, June 30, 2016. As a result, the new permits, effective July 1, 2016, were reviewed for the purpose of this audit.
- a. The permits require sampling at the effluent discharge points, but do not include a clear description of the required sampling location for self-monitoring. The permits should be revised to clearly state the sample location. A diagram or photo of the facility showing the sample location may also be added to the permit for clarification.
 - b. The monthly average and daily maximum limits for lead in AISIN's permit are 0.43 mg/L and 0.69 mg/L, respectively. These values are consistent with the metal finishing pretreatment standards for new sources (PSNS) in 40 CFR Part 433.17. However, the combined wastestream formula was used to calculate alternative categorical limits for AISIN with respect to metal finishing and metal molding and casting categorical standards. The permit should be revised to indicate either the alternative categorical limits for lead or the local limits for lead, whichever is more stringent.
 - c. Both permits have surcharge levels which are contained in a table with monthly average and daily maximum limitations. We strongly recommend placing surcharge levels in a separate table, and specifying that a surcharge exceedance does not constitute a violation subject to enforcement.
 - d. Please note that the industrial user permits may need to be revised to be consistent with the SUO and ERP as streamlining changes are adopted. For example, the permits contain the previous definition of Significant Non-Compliance (SNC) before streamlining changes were introduced. When the SUO and ERP are adopted, the permits should be reviewed and revised as necessary in order to be consistent with the SUO and ERP.

We appreciate the effort that has been put into Clinton's pretreatment program. Please provide this office, by November 4, 2016, a written description of the actions CUB will take to address these comments. If you have any questions, please do not hesitate to contact me at (615) 532-8786 or Laurel.Rognstad@tn.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'LR', with a large, stylized 'A' or 'R' following it.

Laurel Rognstad
Environmental Protection Specialist
Compliance and Enforcement Unit

cc: Mr. Greg Mize – Division of Water Resources, Knoxville EFO